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**UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEW JERSEY**

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In re	:	Chapter 11
	:	
BED BATH & BEYOND INC., <i>et al.</i> ,	:	
	:	Case No. 23-13359 (VFP)
	:	
Debtors. <sup>1</sup>	:	(Jointly Administered)
	:	
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**RESERVATION OF RIGHTS AND JOINDER OF SAFETY NATIONAL CASUALTY CORPORATION TO THE RESERVATION OF RIGHTS OF CHUBB COMPANIES**

Safety National Casualty Corporation (“Safety National”), by and through the undersigned counsel, hereby files this reservation of rights (the “Reservation of Rights”) as to *Debtors’ Motion for Entry of an Order (I)(A) Approving the Auction and Bidding Procedures, (B) Approving Stalking Horse Bid Protections, (C) Scheduling Bid Deadlines and an Auction, (D) Approving the Form and Manner of Notice Thereof, (E) Approving the Form APA, and (II)(A)*

<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

*Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (B) Authorizing the Assumption and Assignment of Assumed Contracts, (C) Authorizing the Sale of Assets and (D) Granting Related Relief [Docket No. 29] (the “Sale Motion”)], the Order (I) Approving the Auction and Bidding Procedures, (II) Approving Stalking Horse Bid Protections, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, and (V) Granting Related Relief [Docket No. 92] (the “Bidding Procedures Order”), the Debtors’ Notice of Selection of Stalking Horse Bidder [Docket No. 708] (the “Stalking Horse Notice”), and Debtors’ Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Docket No. 714] (the “Contract Assumption Notice”) by incorporating by reference as if restated herein and joining in that certain *Reservation of Rights of the Chubb Companies to Debtors’ Motion for Entry of an Order (I)(A) Approving the Auction and Bidding Procedures, (B) Approving Stalking Horse Bid Protections, (C) Scheduling Bid Deadlines and an Auction, (D) Approving the Form and Manner of Notice Thereof, (E) Approving the Form APA, and (II)(A) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (B) Authorizing the Assumption and Assignment of Assumed Contracts, (C) Authorizing the Sale of Assets and (D) Granting Related Relief [Dkt. No. 722] (the “Chubb Reservation of Rights”)* filed by the Chubb Companies.<sup>2</sup>*

WHEREFORE the reasons set forth in the Chubb Reservation of Rights, Safety National respectfully requests a reservation of its rights as to the Sale Motion, Bidding Procedures Order, Stalking Horse Notice, and Contract Assumption Notice.

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<sup>2</sup> Chubb Companies shall have the same meaning as in the Chubb Reservation of Rights.

Dated: June 21, 2023

Respectfully Submitted,

/s/ David Stauss

David Stauss (NJ I.D. #013862005)

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of June, 2023, I caused a copy of the foregoing to be served by electronic means through the ECF system to all registered ECF participants and via U.S. Mail on all parties listed on the creditor matrix as well as by e-mail on the following parties:

<p>Kirkland &amp; Ellis LLP          601 Lexington Avenue          New York, New York 10022          Attn: Joshua A. Sussberg, P.C.,          Emily E. Geier, P.C.,          Derek I. Hunter, and          Ross J. Fiedler          joshua.sussberg@kirkland.com          emily.geier@kirkland.com          derek.hunter@kirkland.com</p>	<p>Cole Schotz P.C.          Michael D. Sirota, Esq.          Warren A. Usatine, Esq., and          Felice R. Yudkin, Esq.          25 Main Street Hackensack          New Jersey 07601          msirota@coleschotz.com          wusatine@coleschotz.com          fyudkin@coleschotz.com</p>
<p>Davis Polk &amp; Wardwell LLP,          450 Lexington Avenue          New York, New York 10017          Attn: Marshall S. Huebner          marshall.huebner@davispolk.com          Adam L. Shpeen          adam.shpeen@davispolk.com          Steven Z. Szanzer          steven.szanzer@davispolk.com          Michael Pera          michael.pera@davispolk.com</p>	<p>Proskauer Rose LLP          Eleven Times Square          New York, NY 10036          Attn: David M. Hillman          DHillman@proskauer.com          and Megan R. Volin          MVolin@proskauer.com</p>
<p>Office of the United States Trustee          Andrew R. Vara, U.S. Trustee, Regions 3 &amp; 9          Fran B. Steele, Esq.          Fran.B.Steele@usdoj.gov</p>	<p>Pachulski Stang Ziehl &amp; Jones LLP          Robert J. Feinstein          Bradford J. Sandler          Paul J. Labov          Colin R. Robinson          780 Third Avenue, 34th Floor          New York, NY 10017          rfeinstein@pszjlaw.com          bsandler@pszjlaw.com          plabov@pszjlaw.com          crobinson@pszjlaw.com</p>

Overstock.com, Inc. 799 W. Coliseum Way Midvale, UT 84047 Attention: Chief Legal Officer and Corporate Secretary Email: gnickle@overstock.com	Wachtell, Lipton, Rosen & Katz 51 West 52nd Street New York, NY 10019 Attn: Scott K. Charles Michael S. Benn Gordon S. Moodie E-Mail: SKCharles@wlrk.com MSBenn@wlrk.com GSMoodie@wlrk.com
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/s/ David Stauss

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